

EXHIBIT 6 –
Collier Declaration

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL
PARK, LLC, and

TIGER KING, LLC,

Defendants.

Case No. 6:20-cv-00423-JFH

DECLARATION OF ANDREW COLLIER

I am Andrew Collier. I am employed as the Executive Officer for the Environment and Natural Resources Division (“ENRD”) at the U.S. Department of Justice (“DOJ”).

As the Executive Officer, I supervise several groups within the Executive Office, two of which are the Office of the Comptroller and the Office of Information Management.

One of the functions of the Office of the Comptroller is to review and approve requests for expenditures involving litigation costs such as deposition transcripts, printing, graphics, and expert witnesses. After a request for expenditures is approved, the authorization for expenditures is forwarded to the Justice Management Division, which provides for payment through the U.S. Department of the Treasury.

The Office of Information Management (“OIM”), in the regular course of business, maintains ENRD’s Case Management System (“CMS”), a database that tracks all time spent by

ENRD attorneys and paralegals on specific cases. In the regular course of ENRD's business, ENRD attorneys and paralegals are required by Division policy to enter into the CMS a case number, activity code, and work date for each hour worked. ENRD attorneys and paralegals are required to make these entries at the time of, or shortly after, they perform the work. The integrity of ENRD's time data is internally audited twice per year. In the event an ENRD attorney or paralegal cannot access CMS (i.e., the attorney or paralegal is on travel), ENRD attorneys and paralegals are required, as a regular course of business, to send an electronic or paper document directly to OIM for key entry into CMS.

All attorney and paralegal time data for ENRD, including the Wildlife & Marine Resources Section, is stored electronically in the CMS, in the regular course of ENRD's business.

The attached document is a true and correct report generated by my staff for the above captioned case, DJ case number 90-8-11-08395. The labor hours were extracted from the CMS by the above referenced DJ case number. Attorney and non-attorney labor costs were calculated using the annual salary for the attorneys and paralegals listed for ENRD for Fiscal Year 2021. The labor costs include the direct costs from the annual salary as well as a percentage multiplier to include benefits and overhead costs for the Environment and Natural Resources Division.

Employees within the Office of the Comptroller and the Office of Information Management, as part of the normal course of business within the Executive Office, review and approve, and maintain or have access to all the underlying documentation representing ENRD costs incurred for all cases, including the *Lowe* case.

I have personal knowledge of the process by which all the ENRD cost documentation is received, reviewed, approved, compiled, and maintained. As the Supervisor of all the employees who work in the Office of the Comptroller and the Office of Information Management, I am the records custodian for all the underlying documentation of ENRD costs incurred for the *Lowe* case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Andrew T. Collier
EXECUTIVE OFFICER, U.S. DOJ/ENRD

Digitally signed by Andrew Collier
Date: 2021.05.28 12:30:42 -04'00'

Andrew T. Collier

Executed this 28th day of May 2021, in Washington, D.C.

DJ Number: 90-8-11-08395

	Hourly Labor Rate	Hours	Direct Labor Costs	Indirect Costs	TOTAL Direct Labor & Indirect Costs
FY21					
Devon Flanagan	\$ 73.63	10.50	\$ 773.10	\$ 1,549.41	\$ 2,322.51
Kyle Hogan	\$ 34.84	42.00	\$ 1,463.36	\$ 2,932.79	\$ 4,396.15
Briena Strippoli	\$ 82.61	40.00	\$ 3,304.60	\$ 6,622.88	\$ 9,927.48
Mary Hollingsworth	\$ 78.46	83.50	\$ 6,551.71	\$ 13,130.56	\$ 19,682.27
Total		176.00	\$ 12,092.77	\$ 24,235.63	\$ 36,328.41
Total Direct Labor and Indirect Cost:		176.00	\$ 12,092.77	\$ 24,235.63	\$ 36,328.41